

STATE OF MISSISSIPPI



**JIM HOOD**  
ATTORNEY GENERAL

June 10, 2013

Jamie S. Gorelick  
WilmerHale  
1875 Pennsylvania Avenue, NW  
Washington, D.C. 20006  
[jamie.gorelick@wilmerhale.com](mailto:jamie.gorelick@wilmerhale.com)

Re: Google Litigation Hold Notice  
Preservation of Relevant Information: Paper Documents and Electronically  
Stored Information

Dear Ms. Gorelick:

The State of Mississippi (the "State") is investigating and evaluating Google's conduct related to its search algorithm, auto-complete feature, advertising policies, and any other related functions. The purpose of this investigation is to determine whether there exist any violations of Mississippi law. One of the many potential outcomes of the ongoing investigation could be civil or criminal litigation arising under state law.

As you are aware, parties have a duty to preserve potentially relevant information that may be used as evidence in pending or reasonably foreseeable litigation. Once a party reasonably anticipates litigation, it must suspend its routine document retention/destruction policy and put in place a "litigation hold" to ensure the preservation of relevant documents. It is crucial that Google, its employees, and agents ("Google") take affirmative steps to preserve both paper documents and electronically stored information that are relevant to this investigation and that are in Google's possession, custody or control.

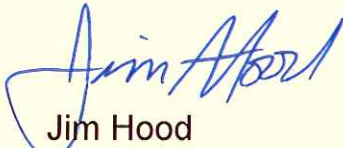
Accordingly, the State formally requests that Google take all appropriate steps necessary to preserve all potentially relevant information pertaining to the State's investigation during the time period covering August 17, 2011 through today and going forward. Google should not discard documents or electronically stored information that is relevant, nor delete, overwrite, alter, or destroy such materials.

"Potentially relevant information" may include YouTube videos related to illicit activity, such as illegal drug infomercials and forged identification documents. It has come to our attention that Google may be removing such videos, documents, and/or other related materials from its platforms, and may be altering its auto-complete feature to eliminate phrases connected to these illicit activities. We request that Google comply with its legal responsibility to retain all relevant evidence related to any such removed content.

In order to comply with this litigation hold request, we ask you to take affirmative steps to prevent intentional or inadvertent destruction of all relevant evidence. To determine what materials may be relevant, Google should refer to the following correspondence: 1) letter from Attorneys General Louie, Cuccinelli, and Hood dated February 13, 2013; 2) letter from Attorney General Hood dated April 1, 2013; and 3) letter from Attorney General Hood dated May 21, 2013.

Thank you for your attention to this matter, and please feel free to contact me should you have any questions related to this litigation hold request.

Sincerely yours,



Jim Hood  
Attorney General

cc: Mr. Kent Walker